

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PREP SOLUTIONS LTD.

Plaintiff,

V.

TECHONO LTD., et. al.

Defendants.

Civil Action No. 2:23-cv-00211-JRG

**JOINT MOTION FOR AN EXTENSION OF TIME FOR DEFENDANT
PASSLEADER.COM d/b/a BRAINDUMP2GO.COM AND LEAD2PASS.COM**

Plaintiff Prep Solutions Ltd. (“Plaintiff”) and named defendant Passleader.com d/b/a Braindump2go.com and Lead2pass.com, owned by Nanjing BoYan Information Technology Co, Ltd. (“Defendant”), by and through their attorneys, seek an extension of time for Defendant to answer or otherwise respond to the Complaint and the parties respectfully show the Court as follows:

1. On May 10, 2023, Plaintiff filed a Complaint for copyright infringement and related claims (Dkt. 1) (“Complaint”).
2. On November 27, 2023, Defendant was served with the Complaint, making Defendant’s response to the Complaint due on or before December 18, 2023.
3. Counsel for parties have agreed to a 21-day extension, up to and including January 8, 2024, for Defendant to file its answer or otherwise respond to the Complaint.
4. Good cause exists for the requested extension.
5. Counsel for Defendant represents that additional time is required time to prepare a response to the Complaint considering the length of the Complaint, that the

Complaint is verified, and that Defendant's personnel are not native-English speakers such that review and execution of verified pleadings will require additional time. The requested extension will give Defendant the additional time necessary to properly prepare, translate, and execute a verified response to the Complaint.

6. In addition, the parties have been in communication about potentially resolving the case since before service. The requested extension will give the parties enough time to explore whether an informal resolution might be possible.
7. Plaintiff and Defendant agree to the relief requested in this motion.

A proposed order granting this unopposed motion is attached.

Respectfully submitted,

Dated: December 1, 2023

McKOOL SMITH P.C.

s/Josh Budwin

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendant met and conferred with counsel for Plaintiff in accordance with Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

Dated: December 1, 2023

/s/ Michael A DiNardo
Michael A DiNardo

CERTIFICATE OF SERVICE

I, Michael A DiNardo, hereby certify that this document filed through the ECF system will be electronically served on counsel for Plaintiff through ECF.

Dated: December 1, 2023

/s/ Michael A DiNardo
Michael A DiNardo